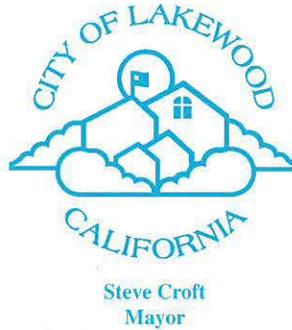


Ariel Pe
Vice Mayor

Todd Rogers
Council Member



Jeff Wood
Council Member

Vicki L. Stuckey
Council Member

June 13, 2022



Ms. Heather Halsey
Executive Director
Commission on State Mandates
980 Ninth Street, Suite 300
Sacramento, CA 95814

Comments to Commissions Draft Proposed Decision, Municipal Storm Water, City of Lakewood IRC, 20-0304-I-07

Dear Ms. Halsey,

Please accept the City of Lakewood's comments to the Commission of State Mandate's staff Draft Proposed Decision regarding our Incorrect Reduction claim.

We concur with staff's recommendation regarding Issue 1. Claiming instructions for Ongoing Maintenance Costs were specifically drafted to utilize a Reasonable Reimbursement Methodology which was designed to offer a simplified and uniform method to compute trash receptacle maintenance costs without the burden of providing the actual contemporaneous source documentation. We look forward to working with the State Controller's Office to reach an equitable resolution for these costs.

However, we disagree with staff's conclusion on Issue 2 that Proposition A funds should have been deducted from our reimbursement claims. We stand by our analysis and believe that it would be equitable for the State to reimburse the City for costs expended to implement a State Mandated program. We incurred these costs in good faith and expectation these mandated costs would be reimbursed that we could then repay and restore those funds to pay for true city priorities. Commission staff analysis overlooks the realities of how scarce General Fund dollars are. Paying for expensive State Mandated programs from General Funds is often not possible and local agencies are forced to seek other funding sources to comply with State laws.

I am personally conversant with the foregoing facts and information presented in this Incorrect Reduction Claim, and if so required, I could and would testify to the statements made herein. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct of my own personal knowledge or belief.

Executed this 13th day of June, 2022 in Lakewood, California.

Respectfully submitted,

Jose Gomez
Director of Finance and Administrative Services
City of Lakewood

Lakewood

DECLARATION OF SERVICE BY EMAIL

I, the undersigned, declare as follows:

I am a resident of the County of Sacramento and I am over the age of 18 years, and not a party to the within action. My place of employment is 980 Ninth Street, Suite 300, Sacramento, California 95814.

On June 14, 2022, I served the:

- **Claimant's Comments on the Draft Proposed Decision filed June 14, 2022**

Municipal Stormwater and Urban Runoff Discharges, 20-0304-I-07

Los Angeles Regional Quality Control Board Order No. 01-182,

Permit CAS004001, Part 4F5c3

Fiscal Years: 2002-2003, 2003-2004, 2004-2005, 2005-2006, 2006-2007, 2007-2008,
2008-2009, 2009-2010, 2010-2011, 2011-2012, 2012-2013

City of Lakewood, Claimant

By making it available on the Commission's website and providing notice of how to locate it to the email addresses provided on the attached mailing list.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on June 14, 2022 at Sacramento, California.



Jill L. Magee

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COMMISSION ON STATE MANDATES

Mailing List

Last Updated: 5/20/22

Claim Number: 20-0304-I-07

Matter: Municipal Storm Water and Urban Runoff Discharges

Claimant: City of Lakewood

TO ALL PARTIES, INTERESTED PARTIES, AND INTERESTED PERSONS:

Each commission mailing list is continuously updated as requests are received to include or remove any party or person on the mailing list. A current mailing list is provided with commission correspondence, and a copy of the current mailing list is available upon request at any time. Except as provided otherwise by commission rule, when a party or interested party files any written material with the commission concerning a claim, it shall simultaneously serve a copy of the written material on the parties and interested parties to the claim identified on the mailing list provided by the commission. (Cal. Code Regs., tit. 2, § 1181.3.)

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